

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SUSAN PINSKY,

Plaintiff,

- against -

JP MORGAN CHASE & CO.,

Defendant.
-----X

ECF

07 Civ. 3328 (CM) (HP)

**STIPULATION OF
ADJOURNMENT**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned that the time for Defendant JPMorgan Chase Bank, N.A., incorrectly named herein as JP Morgan Chase & Co., to move, answer, object or otherwise plead against the Complaint in this action is extended from Thursday, May 3, 2007 to and including Tuesday, May 15, 2007.

Dated: May 2, 2007

SCHWARTZ, LICHTEN & BRIGHT, P.C.

By: Arthur Z. Schwartz (70#)

Arthur Z. Schwartz, Esq.

275 Seventh Avenue, Suite 1700

New York, New York 10001

(212) 228-6320

Attorneys for Plaintiff

Dated: May 2, 2007

**JPMORGAN CHASE LEGAL AND
COMPLIANCE DEPARTMENT**

By: Frederic L. Lieberman

Frederic L. Lieberman, Esq.

Attorneys for Defendant

One Chase Manhattan Plaza, 26th Floor

New York, New York 10081

(212) 552-1815

157736 v1

5/5/2007
A. Adler

STAMP
ELECTRONICALLY FILED
FILED: 5/10/07

SO ORDERED:

May _____, 2007

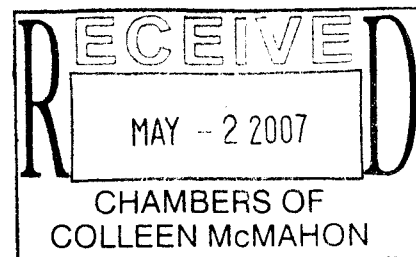
U.S.D.J.



JPMorgan Chase & Co.
Legal and Compliance Department
One Chase Manhattan Plaza
New York, NY 10081

Frederic L. Lieberman, Esq.
Vice President and
Assistant General Counsel
[212] 552-1815
[Fax] 552-1630

May 2, 2007



Via Facsimile (212) 805-6326 and (914) 390-4152

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

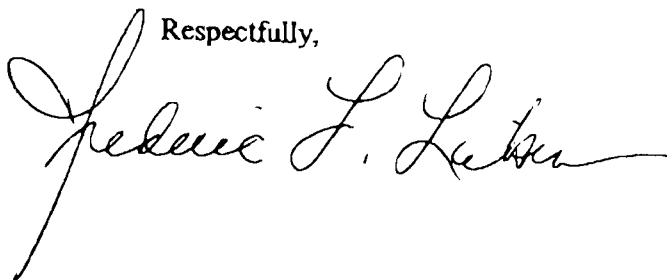
Re: Susan Pinsky v. JP Morgan Chase & Co.
(U.S. Dist. Ct., S.D.N.Y., 07 Civ. 3328 (CM) (HP))

Your Honor:

I am counsel for JPMorgan Chase Bank, N.A. in the above-entitled action, which Defendant removed to this Court on April 26, 2007. Prior to Defendant's removal of this action from New York State Supreme Court, the parties entered into a Stipulation extending Defendant's time to respond to the Complaint from April 17, 2007 to May 15, 2007, a copy of which was attached to Defendant's Notice of Removal. Since Fed. R. Civ. P. 81(c) provides that, in a removal case, Defendant's time to respond to the Complaint extends only to five (5) days after removal, i.e., May 3, 2007, I am enclosing a copy of a Stipulation and Order extending the time for Defendant to respond to the Complaint from May 3, 2007 until May 15, 2007, in order to complete my investigation of Plaintiff's allegations and preparation of Defendant's Answer. The Stipulation will be filed with the Clerk via ECF. This is Defendant's first request for an extension of its time to respond to the Complaint in this Court.

Due to telephone issues in Plaintiff's counsel's new office, I was not able to speak with Mr. Schwartz until this morning. In that conversation, Mr. Schwartz consented to Defendant's request. I also am mailing a copy of this letter and the Stipulation to Mr. Schwartz rather than faxing or emailing to him because, in connection with his recent move of his offices, he is currently unable to receive faxed or email transmissions of these papers. Defendant respectfully requests that Your Honor "So Order" the Stipulation and Order.

Respectfully,

A handwritten signature in black ink, appearing to read "Federico L. Lujan". The signature is fluid and cursive, with a long horizontal stroke at the end.

FLL

Encl.

cc: Arthur Z. Schwartz, Esq.